

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

RAYMOND JAMES & ASSOCIATES, INC.,)	
)	
Plaintiff,)	
)	
v.)	No. 2:18-cv-02104-JTF-tmp
)	
50 NORTH FRONT ST. TN, LLC,)	
)	
Defendant.)	

NOTICE OF SERVICE OF PLAINTIFF’S RULE 26(a)(2) DISCLOSURES

Plaintiff Raymond James & Associates, Inc. (“Raymond James”), by and through undersigned counsel, hereby files this Notice of Service of Plaintiff’s Rule 26(a)(2) Disclosures. Raymond James’ Rule 26(a)(2) disclosures—which are attached hereto—were served upon counsel for Defendant via electronic mail on August 31, 2018.

Respectfully submitted,

BURCH, PORTER & JOHNSON, PLLC

/s/ Gary Scott Peeples
Melissa A. Maravich (BPR No. 13876)
Gary Scott Peeples (BPR No. 32303)
130 North Court Avenue
Memphis, TN 38103
T: (901) 524-5000
F: (901) 524-5024
E: mmaravich@bpjlaw.com
gpeeples@bpjlaw.com

- and -

THE PROSSER LAW FIRM

/s/ Niel Prosser

Niel Prosser (BPR No. 11647)

Rob Clapper (BPR No. 34180)

Kyle Johnson (BRP No. 36066)

5865 Ridgeway Center Parkway, Suite 300

Memphis, TN 38120

T: (901) 820-4433

E: np@prosserlaw.com

rclapper@prosserlaw.com

kjohnson@prosserlaw.com

Counsel for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was filed using the Court's CM/ECF system on this the 31st day of August, 2018, which will automatically send notice of the filing to all counsel of record.

/s/ Gary Scott Peeples_____

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

RAYMOND JAMES & ASSOCIATES, INC.,)	
)	
Plaintiff,)	
)	
v.)	No. 2:18-cv-02104-JTF-tmp
)	
50 NORTH FRONT ST. TN, LLC,)	
)	
Defendant.)	

PLAINTIFF’S RULE 26(a)(2) DISCLOSURES

Plaintiff Raymond James & Associates, Inc. (“Raymond James”), by and through undersigned counsel and pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure, makes the following Rule 26(a)(2) Disclosures to Defendant 50 North Front St. TN, LLC:

The following individual has specialized knowledge that may assist the trier of fact in understanding the relevant evidence in this case. This individual may accordingly be called upon to provide expert testimony in this case in addition to his role as a fact witness: **Derek Recer, Vice President of Corporate Real Estate, Raymond James.**

Mr. Recer has not been retained or specially employed to provide expert testimony in this case, nor is he a witness whose duties as an employee regularly involve giving expert testimony. *See* Fed. R. Civ. P. 26(a)(2)(B). As a result, Mr. Recer will not be providing a written report. *See id.*

Pursuant to Rule 26(a)(2)(C), Mr. Recer may offer expert testimony regarding the following subject: the costs associated with Raymond James’ relocation from the Raymond

James Tower at 50 North Front Street to one or more locations within the greater Memphis area. Mr. Recer may also provide additional testimony regarding various allegations in the Complaint and/or other information that he has learned in this case.

Mr. Recer may also provide information and offer testimony that is generally consistent with other elements of Raymond James' Rule 26(a)(1) initial disclosures.

In accordance with Rule 26(a)(2)(C) and the pertinent case law, a summary of facts and opinions about which Mr. Recer, as a Rule 26(a)(2)(C) witness¹ follows: Mr. Recer generally expects to testify that the costs associated with Raymond James' relocation from 50 North Front Street to one or more locations within the greater Memphis area will be approximately \$2.50 per square foot.

Respectfully submitted,

BURCH, PORTER & JOHNSON, PLLC

/s/ Gary Scott Peebles
Melissa A. Maravich (BPR No. 13876)
Gary Scott Peebles (BPR No. 32303)
130 North Court Avenue
Memphis, TN 38103
T: (901) 524-5000
F: (901) 524-5024
E: mmaravich@bpjlaw.com
gpeeples@bpjlaw.com

- and -

THE PROSSER LAW FIRM

/s/ Niel Prosser
Niel Prosser (BPR No. 11647)
Rob Clapper (BPR No. 34180)
Kyle Johnson (BRP No. 36066)
5865 Ridgeway Center Parkway, Suite 300

¹ Mr. Recer may also testify as an ordinary fact witness.

Memphis, TN 38120
T: (901) 820-4433
E: np@prosserlaw.com
rclapper@prosserlaw.com
kjohnson@prosserlaw.com

Counsel for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was sent to counsel for Defendant via email on this the 31st day of August, 2018.

/s/ Gary Scott Peebles